BEFORE THE

PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII



In the Matter of the Application of

HAWAIIAN ELECTRIC COMPANY, INC.

For Approval of Rate Increases and Revised Rate Schedules and Rules

DOCKET NO. 2008-0083

DEPARTMENT OF DEFENSE'S FIFTH
SUBMISSION OF INFORMATION REQUESTS.

AND

CERTIFICATE OF SERVICE

RICHARD CARLILE

Associate Counsels (Code 09C)
Naval Facilities Engineering Command, Pacific 258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134
Telephone (808) 472-1195

ATTORNEYS FOR DEPARTMENT OF DEFENSE

OF THE STATE OF HAWAII

In the Matter of the Application of	_)	
HAWAIIAN ELECTRIC COMPANY, INC.)	DOCKET NO. 2008-0083
For Approval of Rate Increases and Revised Rate Schedules and Rules)	
	_)	

DEPARTMENT OF DEFENSE'S FIFTH SUBMISSION OF INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC.

COMES NOW, DEPARTMENT OF DEFENSE by and through its undersigned attorney and hereby submits its Fifth Submission of Information Requests to Hawaiian Electric Company, Inc.

DATED: Honolulu, Hawaii, January 22, 2009.

RICHARD CARLILE

Associate Counsels (Code 09C)

Naval Facilities Engineering Command, Pacific

258 Makalapa Drive, Suite 100

Pearl Harbor, HI 96860-3134

Telephone (808) 472-1195

ATTORNEYS FOR

DEPARTMENT OF DEFENSE

DEPARTMENT OF DEFENSE'S FIFTH

SUBMISSION OF INFORMATION REQUESTS

TO HAWAIIAN ELECTRIC COMPANY, INC.

INSTRUCTIONS

In order to expedite and facilitate Department of Defense's review and analysis in the above matter, the following is requested:

- 1. For each response, HECO should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
- 2. Unless otherwise specifically requested, for applicable schedules or workpapers, HECO should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
- 3. When an information request makes reference to specific documentation used by HECO to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, HECO instructions, or any other relevant authoritative source which HECO used.
- 4. Should HECO claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. State under what conditions HECO is willing to permit disclosure to Department of Defense (e.g., protective agreement, review at business offices, etc.); and
 - d. If HECO claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions

thereof, that HECO claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

5. Please provide each response in electronic format (if available) as well as paper. Please provide two paper copies of each response, with one copy going directly via overnight delivery to DOD at the following address:

Dr. Khojasteh Davoodi
NAVFAC HQ ACQ-URASO
1322 Patterson Avenue, S.E., Suite 1000
Washington Navy Yard
Washington, D.C. 20374-5065
E-mail: Khojasteh.Davoodi@navy.mil

Ph. (202) 685-3319 Fax: (202) 433-7159

and one copy going directly via overnight delivery to DOD's consultant at the following address:

Maurice Brubaker
Brubaker & Associates, Inc.
16690 Swingley Ridge Road, Suite 140
Chesterfield, MO 63017
Email: mbrubaker@consultbai.com
Ph. (636) 898-6725

Please also provide responses in electronic format to Dr. Davoodi and Brubaker & Associates, Inc., at the e-mail addresses above, and to Mr. Richard Carlile at <u>richard.carlile@navy.mil</u>.

DEPARTMENT OF DEFENSE'S FIFTH SET OF INFORMATION REQUESTS

TO HAWAIIAN ELECTRIC COMPANY, INC.

DOCKET NO. 2008-0083

The following information requests are directed to HECO.

- DOD-108. Referring to Excel spreadsheet T-22 09 Update Att. 2 HECO-WP-2203.xls, worksheet X Load Data By Rate Class, please state how many of the 3,750 bills under the proposed Schedule P-Sec (excluding Network) rate class definition are:
 - a) Bills from present Schedule PP (former rate class definition)
 - b) Bills from present Schedule PS (former rate class definition)
- DOD-109. Referring to Excel spreadsheet T-22 09 Update Att. 2 HECO-WP-2203.xls, worksheet X TY Rev By Rate Class, please state how much of the \$410,467 million in TY Sales Revenue at current effective rates for customers on proposed Schedule P is:
 - a) Sales revenue from customers presently on Schedule PP
 - b) Sales revenue from customers presently on Schedule PS Sec
 - c) Sales revenue from customers presently on Schedule PS Nwk

 Please provide the billing determinants for each group and the workpapers (in native format with all formulas intact) showing the derivation of the billing determinants and revenues.
- DOD-110. Referring to Excel spreadsheet T-22 09 Update Att. 2 HECO-WP-2203.xls, worksheet X TY Rev By Rate Class, please state how much of the \$432,495

million in TY Sales Revenue at proposed rates for customers on proposed Schedule P is:

- a) Sales revenue from customers presently on Schedule PP
- b) Sales revenue from customers presently on Schedule PS Sec
- c) Sales revenue from customers presently on Schedule PS Nwk

 Please provide the billing determinants for each group and the workpapers (in native format with all formulas intact) showing the derivation of the billing determinants and revenues.
- DOD-111. Referring to Excel spreadsheet T-22 09 Update Att. 2 HECO-WP-2203.xls, worksheet X HLADATA, please state the TY Sales MWh, recorded kWh, recorded kWm and LF for the present Schedule PP customers and present Schedule PS customers, separately, that make up the proposed Schedule P-Sec (excluding Network) rate class.
- DOD-112. Referring to Excel spreadsheet T-22 09 Update Att. 2 HECO-WP-2203.xls, worksheet X HAFDATA, please provide all of the line items (class load factor, primary line weighting factor, secondary line weighting factor, revenues, increases, etc.) for the present Schedule PP customers and present Schedule PS customers, separately, that make up the proposed Schedule P-Sec (excluding Network) rate class.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing document was duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

Ms. Catherine P. Awakuni
Executive Director
Division of Consumer Advocacy
Department of Commerce and Consumer Affairs
P. O. Box 541
Honolulu, HI 96809

Darcy L. Endo-Omoto Vice President - Government and Community Affairs Hawaiian Electric Company, Inc. P. O. Box 2750 Honolulu, HI 96840-0001

Mr. Dean K. Matsuura Manager – Regulatory Affairs P. O. Box 2750 Honolulu, HI 96840-0001

Thomas W. Williams, Jr., Esq. Peter Y. Kikuta, Esq. Damon L. Schmidt. Esq. Goodsill Anderson Quinn & Stifel Alii Place, Suite 1800 1099 Alakea Street Honolulu, HI 96813

Counsel for Hawaiian Electric Company, Inc.

DATED: January 22, 2009, Honolulu, Hawaii

2 Copies

RICHARD CARLILE

Associate Counsel

Naval Facilities Engineering Command,

Pacific